

January 4, 2008

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

RE: MB Docket No. 07-172, RM – 11338 - Amendment of Service and Eligibility Rules
For FM Broadcast Translator Stations

Dear Ms. Dortch:

Legacy Communications Corporation is a licensee and/or permittee of eight AM stations, which serve small and medium size communities in the West where soil conditions and mountainous terrain deters AM station signal coverage.

We support the immediate adoption by the Commission of the amendment of service and eligibility rules for FM translator stations to rebroadcast AM station signals. The proposed rulemaking will help equalize the inherent technical handicap of AM station operators providing a more competitive basis by which to compete with other AM and FM stations, satellite radio, Internet and other emerging sources of information and entertainment. We have experienced first hand the degradation of AM station signals caused by urban growth, concrete and steel buildings, and high voltage power lines that cause interference to AM signals.

AM station operators should be authorized to rebroadcast direct programming on fill-in FM translators 24/7 within the AM station's 2 mV/m daytime contour. FM translator stations not owned by the AM station operator should be authorized to rebroadcast an AM station signal without restrictions.

AM station operators should not be limited in the number of fill-in translators allowed to be owned within the service area of the AM station being rebroadcast. The benefit proposed by the rulemaking is long over due for AM station operators. We respectfully urge the expeditious adoption by the Commission of the amendment of service and eligibility rules for FM translator stations to rebroadcast AM station signals.

Sincerely,



E. Morgan Skinner, Jr., President

CC: Dan J. Alpert, FCC Counsel